



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM:

Date: 06/20/2014
Subject: Antimicrobial Copper Alloys-Group III and Associated Fabricated Products
PC Code: 022501 **DP Barcode:** 419514
EPA Reg. No.: 82012-3 **Case No.:** 4025
Document Type: Acute Toxicity Review **CAS No.:** 7440-50-8
MRID No.: 469993-02 **40 CFR:** 158.500

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Applicant: Copper development Association, Inc.
260 Madison Avenue
New York, New York 10016

FORMULATION FROM EPA Reg. No. 82012-3 LABEL:

Active Ingredient(s):	% by wt.
Copper.....	82.6%
Other Ingredient(s):	17.4%
Total:	100.0%

BACKGROUND: In the 8 month response to the Coppers RED, the registrant is submitting Waiver Requests in MRID No. 469993-02 dated 12/01/2006 for all six acute toxicity studies due to the fact that: (1) copper is a ubiquitous naturally occurring metal exempt from the requirements of a tolerance; (2) the chemical components of copper alloys are not bioavailable due to the physical chemical structure of the alloys. Additionally: Oral exposure to copper alloy products will not occur due to the size, shape and use patterns of the alloys. Ingestion of products manufactured from copper alloys is not of potential concern for toxicity. Prolonged dermal, inhalation and ocular exposure to copper alloy products will not occur due to proposed used patterns of the alloys. Dermal, inhalation and ocular exposure to products manufactured from copper alloys is not potential concern for dermal and inhalation toxicity, eye and dermal irritancy, and contact sensitization, respectively.

After reviewing the CSF, the Agency will grant all waiver requests and assign a category IV for all five toxicity/irritation endpoints and a non-sensitizer for dermal sensitization.

RECOMMENDATIONS:

- The acute toxicity waivers are acceptable to support the reregistration of EPA Reg. No. **82012-3**.

The acute toxicity profile for EPA Reg. No. **82012-3** is currently:

Acute Oral	IV	Waived
Acute Dermal	IV	Waived
Acute Inhalation	IV	Waived
Primary Eye	IV	Waived
Primary Dermal	IV	Waived
Skin Sensitization	non -sensitizer	Waived

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #:082012-00003 Antimicrobial Copper Alloys-Group III and Associated Fabricated Products

SIGNAL WORD: **CAUTION** (*optional*)

FIRST AID (*optional*):

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.